



California Regional Water Quality Control Board  
Central Valley Region  
Katherine Hart, Chair



Matthew Rodriguez  
Secretary for  
Environmental Protection

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<http://www.waterboards.ca.gov/centralvalley>

Edmund G. Brown Jr.  
Governor

7 September 2011

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P.O. Box 971  
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**REVIEW OF THE FINAL CLOSURE AND POST-CLOSURE MAINTENANCE PLAN,  
DELLAR TRUST PROPERTY, SACRAMENTO COUNTY**

Central Valley Water Board staff has reviewed the 22 July 2011 *Closure and Post-Closure Maintenance Plan* (herein referred to as "the 2011 Plan") for the Dellar Trust Property. The Plan was submitted by the Sylvia Dellar Survivor's Trust in response to Cleanup and Abatement Order (CAO) No. R5-2008-0705. Previous closure plans were submitted by the City of Sacramento to comply with CAO R5-2008-0705 and were reviewed by staff. However, discovery of the Valley Elderberry Longhorn Beetle (VELB) at the site has caused further delays with respect to completing the closure cover according to the schedule of the CAO, which required final construction of the cover by 30 October 2010. This 2011 Plan is a revised plan that proposes to construct a grade-to-drain cover while avoiding the incidental take of the VELB and the elderberry plants.

The 2011 Plan proposes to construct a minimum two foot thick final cover, graded to a maximum slope of 3%, and vegetated with an appropriate seed mix for the Sacramento area. Storm water will be conveyed by perimeter ditching into two detention basins (east and west). The storm water conveyance system is designed to capture and contain the 100 year, 24 hour precipitation event. Storm water impounded in the basins will be time-released into an existing City of Sacramento storm drain.

During the geotechnical investigation of the detention basins, waste was encountered. Waste encountered in the area of the future western detention basin will be excavated and used for fill at the site. Waste encountered where the eastern detention basin will be constructed was identified much deeper and will remain in place. To mitigate potential for storm water infiltration through the bottom of the eastern basin, the Discharger has proposed to line the eastern basin bottom and lower side walls with a four foot thick layer of imported soil with a low plasticity index, low liquid limit, and a substantial sand component. This soil will provide a

fairly low hydraulic conductivity and be resistant to desiccation cracking. The western detention basin will be lined with a two foot thick layer of soil meeting the above specifications. The 2011 Plan included a Construction Quality Assurance (CQA) Plan as required by Title 27, section 20323, and meets the intent of Title 27, section 20324.

The design submitted provides a work-around of the Elderberry plants so as to preserve the habitat for the VELB. The VELB is listed as a threatened species by the United States Fish and Wildlife Service, yet is slated for future delisting in next few years. Once the VELB is delisted, the Discharger proposes to remove the elderberry plants from the site and grade the surface to a uniform 3% grade. However, until the VELB is delisted, the Discharger must maintain the cover area in and around the drip line of the Elderberry plants, and maintain proper drainage that does not promote erosion or sedimentation in the area of the elderberry plants. Staff understands that work in this area will be conducted by hand.

The 2011 Plan includes a proposal to destroy an inactive agricultural well located within the eastern detention basin footprint. The Discharger will destroy the well prior to construction of the final closure cover and will do so in accordance with the Sacramento County Environmental Management Department (SCEMD) well destruction guidelines. The well is thought to be approximately 400 feet deep, however, this has not been confirmed nor has the destruction method been chosen since an obstruction in the well casing was identified during preliminary field work. The Discharger will remove the obstruction to further investigate the well casing, confirm well depth, and choose an appropriate destruction method in accordance with SCEMD guidelines.

Post closure land use will remain non-irrigated open space. If post closure use is changed in the future, the Discharger will manage the use to conform to Title 27. Post closure maintenance will be conducted by the Discharger and includes an annual inspection prior to the wet season and an inspection following the first major storm event. Repairs required due to storm events will be conducted promptly.

The Discharger has proposed a schedule that includes tasks to be completed during the 2011 construction season with completion of the final closure cover by the end of the 2012 construction season. The 2011 tasks to be completed include the following:

2011 TASKS AND SCHEDULE		
TASK	START DATE	COMPLETION DATE
Well Abandonment	22 August 2011	16 September 2011
Construct Detention Basin pipe run along A Street	5 September 2011	23 September 2011
Conduct work around Radio Tower	19 September 2011	30 September 2011
Reset power poles at new grade	19 September 2011	23 September 2011
CQA Observation	5 September 2011	30 September 2011

2011

Douglas Daggs

Dellar Trust Property Final Closure Plan

Submit CQA Interim Report

21 October 2011

The Interim CQA Report shall be submitted by **12 October 2011**. The 2012 construction schedule begins June 2012 with multiple tasks being completed throughout the season, culminating in the hydroseeding of the final cover by 28 September 2012. The final construction quality assurance report will be submitted on **26 October 2012**.

The *Closure and Post-closure Maintenance Plan* dated 22 July 2011 is an acceptable plan and the Discharger shall implement the plan as a corrective action to abate the effects of waste resulting from landfilling activities on the Dellar Property. Waste identified outside the Dellar Property will require remediation by the responsible parties at a later date.

Please contact me at 916-464-4737 if you have questions.



TODD A. DEL FRATE, P.G.

Engineering Geologist

Compliance and Enforcement Section

cc: David Boyers, Office of Enforcement, State Water Resources Control Board, Sacramento  
Frank Davies, California Integrated Waste Management Board, Sacramento  
Dawn Owen, California Integrated Waste Management Board, Sacramento  
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Tim Crandall, Kleinfelder West, Sacramento





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